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Discover Financial Services LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WOLFGANG R. ALTENBURG,

Plaintiff,

V.

AMERICAN EXPRESS NATIONAL
BANK, et. al.

Defendants.

CASE NO. 2:21-cv-00949-GMN-EJY

**STIPULATION AND ORDER TO
EXTEND TIME FOR DISCOVER
FINANCIAL SERVICES LLC TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

(Third Request)

19 Plaintiff Wolfgang R. Altenburg (“Plaintiff”) and Defendant Discover Financial
20 Services LLC (“Discover”)¹ stipulate and agree that Discover has up to and including
21 September 10, 2021 to respond to Plaintiff’s Complaint (ECF No. 1), to provide
22 Discover additional time to investigate Plaintiff’s allegations and for Discover to
23 prepare a response. The current deadline to file a response is August 25, 2021 (ECF
24 No. 55).

²⁷ ²⁸ ¹ By filing this Stipulation, Discover is not waiving any defense, affirmative or otherwise, it may have in this matter, including, but not limited to, lack of personal jurisdiction.

1 Plaintiff and Discover are in discussions to resolve their claims, and this final
2 extension will permit the parties to explore settlement options without incurring
3 additional unnecessary attorneys' fees and costs.

4 This is the third request for an extension, and it is made in good faith and not
5 for purposes of delay.

6 Dated: August 27, 2021.

7 BALLARD SPAHR LLP

LAW OFFICE OF KEVIN L. HERNANDEZ

8 By: /s/ Joel E. Tasca

9 By: /s/ Kevin L. Hernandez

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21 **ORDER**

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IT IS SO ORDERED:

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UNITED STATES MAGISTRATE JUDGE

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DATED: August 27, 2021

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